



- f) The current Amended Scheduling Order governing this action is attached as Exhibit 1, which contains the current deadlines;
- g) The Court has entered three amended scheduling orders, and this will be the fourth; and
- h) By way of their proposed Fourth Amended Scheduling Order, the Parties seek an extension of all forthcoming deadlines as set forth below, which includes approximately a 90-120 day extension of the current dates which this action is subject to be called for trial. The forthcoming deadlines and proposed new deadlines are as follows:

<u>Item</u>	<u>Current Deadline</u>	<u>Proposed New Deadline</u>
Affidavits of Records Custodian	April 21, 2023	July 28, 2023
End of Discovery	April 21, 2023	July 28, 2023
Mediation	May 1, 2023	May 31, 2023
Motions	May 5, 2023	August 18, 2023
Trial	July 17, 2023	October 16, 2023

WHEREFORE, the Parties move the Court for entry of a Fourth Amended Scheduling Order (a Proposed Order will be presented to the Court along with this Motion).

WITH CONSENT:

s/Phillip Barber (with permission)

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